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DISTRICT OF NEW JERSEY  
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Sills Cummis & Gross P.C.  
Joseph B. Shumofsky  
Linxuan Yan  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 643-7000

Marcus Neiman Rashbaum & Pineiro LLP  
Jeffrey A. Neiman (*pro hac vice* forthcoming)  
Kathryn Meyers (*pro hac vice* forthcoming)  
Jason L. Mays (*pro hac vice* forthcoming)  
One Financial Plaza  
100 SE 3rd Ave., Suite 805  
Fort Lauderdale, Florida 33394  
(954) 462-1200

*Attorneys for Plaintiff Nina Agdal*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.:

**DECLARATION OF QUINCY BAHLER**

1. I, the undersigned, Quincy Bahler, under oath and penalty of perjury pursuant to 28 U.S.C. § 1746, declare the following:

2. My name is Quincy Bahler and I am over the age of 18. The below attestations are based upon my personal knowledge.

3. I am a partner at Sourced Intelligence, LLC, a Los Angeles-based intelligence and security consulting firm. As a partner at Sourced Intelligence, I have been retained by private sector companies and individuals to provide forensic data analysis.

4. I graduated from the University of Southern California in 2009. Shortly after graduating from college, I joined the United States Army. I spent over twelve years in the United States Army, working in the United States Army Special Operations Command, the 101<sup>st</sup> Airborne Division, the 75<sup>th</sup> Ranger Regiment, and the 25<sup>th</sup> Infantry Division. I achieved the rank of Major.

5. I possess more than 13 years of specialized experience in various areas, including but not limited to military operations, intelligence gathering, cyber forensics, investigative procedures, and security protocols.

6. On August 28, 2023, Sourced Intelligence was engaged by Marcus Neiman Rashbaum & Pineiro to assist their client, Nina Agdal, to determine whether Ms. Agdal's Snapchat account had been compromised and accessed by any unauthorized third parties. We conducted a forensic investigation for this purpose, during which I worked alongside several Sourced Intelligence analysts.

7. As described below, having completed the investigation, including the review of data provided by Snapchat, I have concluded that Ms. Agdal's Snapchat account was in fact compromised.

8. On August 29, 2023, with the consent of Ms. Agdal, we initiated an official data download request from Snapchat for all data associated with Ms. Agdal's Snapchat account. Snapchat provided us with extensive data, including login history, account information, user interactions, saved chat transcripts, memories, and geolocation data. I have reviewed all of the data received from Snapchat.

9. In addition to receiving and reviewing data from Snapchat, I have reviewed text message screenshots and emails provided to Sourced Intelligence by Ms. Agdal that were related to her Snapchat account.

10. According to data obtained from Snapchat, on January 31, 2022, at 10:54 AM (UTC), the account password for Ms. Agdal's account was changed. At 11:22 AM, Ms. Agdal received an email notification from Snapchat informing her of a login to her Snapchat account from an iPad Mini (5<sup>th</sup> Generation) with the IP address 23.81.207.40.

11. Analysis utilizing IP identification tools has geolocated IP address 23.81.207.40 to an address in Phoenix, Arizona and to a host identified as Leaseweb USA, a Virtual Private Network (VPN). VPNs are commonly used by bad actors to obscure their IP addresses.

12. On January 31, 2022 at 12:09 PM, Ms. Agdal received an email from Snapchat notifying her that a data request had been initiated from her Snapchat account and that all data from her Snapchat account had been downloaded. This download would have included all photographs and videos contained within the Snapchat account.

13. At 3:01 PM on the same day, January 31, 2022, a second password change was initiated.

14. According to data obtained from Snapchat, on February 16, 2022 at 10:46 AM, 2022, the account password for Ms. Agdal's account was changed again. At 11:00 AM, Ms. Agdal received an email notification from Snapchat informing her of a login to her Snapchat account from an iPhone XS with the IP address 87.249.138.131.

15. Analysis utilizing IP identification tools has geolocated IP address 87.249.138.131 to an address in New York, New York and to a host identified as Datacamp Limited, a Virtual Private Network (VPN).

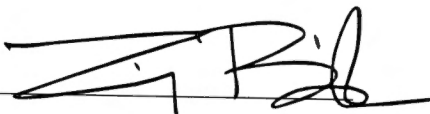
16. On September 1, 2023, we spoke to Ms. Agdal. She advised that (a) she never had owned an iPad Mini (5<sup>th</sup> Generation), (b) she was not in the vicinity of Phoenix, Arizona around January 31, 2022, (c) she never owned an iPhone XS (d) she did not recall initiating a password reset in January 31, 2022 or on February 16, 2022 and (e) she never requested a data download of all videos and photographs from her Snapchat account.

17. We have reviewed the videos and photographs associated with Ms. Agdal's Snapchat account. The video posted on X (formerly Twitter) by Mr. Dillon Danis at 10:07 am (EDT) on August 28, 2023, is included within the videos and photographs we reviewed that are associated with Ms. Agdal's Snapchat account. This video would have been part of the data request by an unknown third party, without authorization, on January 31, 2022.

18. As part of our engagement, I have also overseen a comprehensive search in attempts to determine whether the video posted by Mr. Danis was available on the internet prior to his posting it on August 28, 2023. As part of that search, we have used facial recognition technology, manual and automated social media searches, and other technology to search the internet for the video. To the best of our collective efforts and capabilities and understanding that the internet is vast and constantly evolving, we have not identified any instances of the video's existence on the internet prior to the post by Mr. Danis.

19. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 5<sup>th</sup> day of September 2023



Quincy Bahler